

**Before the
Federal Communications Commission
Washington, D.C.**

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In the Matter of)	
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Framework for Next Generation)	PS Docket No. 10-255
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911 Deployment)	
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COMMENTS OF TECHAMERICA

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TechAmerica hereby submits these comments on the Federal Communications Commission's ("Commission's") Notice of Inquiry addressing the deployment of Next Generation 911 ("NG911") technologies.¹ TechAmerica's members play an active role in the development and deployment of IP-based technologies. TechAmerica is pleased to be able to file comments on their behalf in this proceeding.

TechAmerica is the leading voice for the U.S. technology industry, which is the driving force behind productivity growth and jobs creation in the United States and the foundation for the global innovation economy. Representing approximately 1,200 member companies of all sizes from the public and commercial sectors of the economy, TechAmerica is the industry's largest advocacy organization and is dedicated to helping members' top and bottom lines. It is also the technology industry's only grassroots-to-global advocacy network, with offices in state capitals around the United States, Washington, D.C., Europe (Brussels) and Asia (Beijing).

Representing all sectors of the information technology industry, TechAmerica has a broad and diverse membership. TechAmerica's members include: (a) manufacturers and suppliers of broadband networks and equipment; (b) consumer electronics companies; (c) information and communications technology hardware companies; (d) software and application providers; (e) systems integrators; (f) Internet and e-commerce companies; (g) Internet service providers; (h) information technology government contractors; (i) information technology consulting and sourcing companies; and (j) information technology security companies.

¹*Framework for Next Generation 911 Deployment*, Notice of Inquiry, 76 FED. REG. 2297 (Jan. 13, 2011) (NG911 NOI).

Introduction

As the country's communication system transitions to a fully deployed IP-enabled network, TechAmerica recognizes and appreciates the resulting public benefits, as the Commission notes,² but none more important than the creation of a dynamic and improved NG911 system.

However, as discussed below, the development of a NG911 network poses significant technological and financial challenges that will require time and resources to address. In light of these hurdles, the FCC should refrain from acting hastily to regulate next generation emergency services, applications and devices prior to the resolution of these issues.

Challenges to Deployment of NG911 Networks

The most pressing obstacle to robust deployment of NG911 networks is the fact that public safety agencies have not yet upgraded their systems, services, and devices to accommodate an all IP-enabled communication system. No doubt, the lag between the development of IP-enabled products and services by the technology industry and the overhaul of public safety agencies' systems is significant.

Funding for the evolution of Public Safety Answering Points ("PSAPs") to an IP-enabled system is a prerequisite for the successful deployment of NG911. Absent such funding and local commitment, an NG911 network will not come to fruition. Indeed, the FCC should refrain from imposing obligations on providers and vendors until PSAPs have in place the requisite funding to upgrade their systems and state and local

² NG911 NOI at 2298.

governments have the funding to inform community members of the availability of NG911 and the means of accessing those new emergency services.

In addition to financial challenges, technical hurdles stand in the way of deployment of NG911. While it is true that an IP-enabled communication system allows for the public to communicate with a variety of devices utilizing multiple protocols, such an ability also exposes the network to cyber security threats and interoperability challenges. Standards and technologies will need to be developed by industry and the public safety community in order to address the interoperability of the PSAP, the network, and applicable applications and devices. To provide the necessary amount of flexibility for this standards work, the FCC should not mandate any specific technological standards or architectures. The industry should be provided with the utmost freedom to work with the public safety community to address interoperability challenges with minimal regulatory involvement.

Focusing on a core group of emergency services that support NG911 functionality makes it more likely that local, state, and federal governments, PSAPs, and the private sector can support NG911 services and applications in a timely and cost-effective manner. In addition, the Commission should not require that every consumer device with Internet or cellular connectivity and a suitable user interface have the ability to request emergency assistance. Nor should the Commission require that consumers be able to connect to PSAPs via social network sites or secondary media outlets such as SMS. Consumers do not expect such connectivity when using these technologies and interfaces. Such requirements would not only exacerbate the financial burden on

state and local governments, but would also increase the potential for increased network vulnerabilities, and place at risk the rapid rollout of NG911.

Location-Identification

The FCC asks a series of questions regarding the use of location services and their efficacy in a NG911 network.³ To be sure, location identification remains a significant challenge in the all IP environment.⁴ For example, even if location information could be accurately developed, there exist limitations as to the use of such information, including the fact that PSAPs do not have access to building maps in order to facilitate pinpoint location of a person. While NG911 networks hold great promise in saving lives, such networks are not a panacea and cannot overcome certain practical challenges faced by PSAPs. Therefore, in light of these obstacles, the FCC should refrain at this time from imposing any obligations on Internet service providers, equipment vendors, and others to ensure that location information can be discovered, conveyed, and validated.

Conclusion

TechAmerica welcomes the transition from a circuit-switched communications network to a robust and dynamic IP-enabled communications system. An IP-enabled NG911 system will assuredly lead to significant public benefits. However, the FCC should refrain from imposing additional regulatory obligations at this time given the ongoing standards work that needs to be completed first, and the FCC should also be

³ NG911 NOI at 2307.

⁴ A full analysis of the challenges of location identification with respect to VoIP can be found in comments filed by the VON Coalition. *See* Comments of the VON Coalition, *In the Matter of E911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196 (filed Jan. 19, 2011).

mindful of the significant technological and financial challenges facing state and local governments.